

Message

From: Benton, Tim [Tim.Benton@WestonSolutions.com]
Sent: 12/6/2019 7:30:06 PM
To: Bretz, Emily (USANYS) [Emily.Bretz@usdoj.gov]
CC: Ludmer, Margo [ludmer.margo@epa.gov]; Grosvenor, Sarah [grosvenor.sarah@epa.gov]
Subject: RE: Canadian Radium litigation contact list

Emily,

Yes, our subcontractor will also be represented by our outside counsel so you can indicate that Weston will be moving to quash all 4 of the subpoenas.

Thanks,

Tim

From: Bretz, Emily (USANYS) [mailto:Emily.Bretz@usdoj.gov]
Sent: Friday, December 6, 2019 2:28 PM
To: Benton, Tim <Tim.Benton@WestonSolutions.com>
Cc: Ludmer, Margo <ludmer.margo@epa.gov>; Grosvenor, Sarah <grosvenor.sarah@epa.gov>
Subject: RE: Canadian Radium litigation contact list

**** External Email ****

Thanks for the call Tim. I've changed the language about Tom Wysocki. One question -- will Weston's outside counsel also be representing the subcontractors? If so, we can indicate that Weston will be moving to quash all 4 subpoenas.

From: Bretz, Emily (USANYS)
Sent: Friday, December 6, 2019 12:36 PM
To: 'Benton, Tim' <Tim.Benton@WestonSolutions.com>
Cc: Ludmer, Margo <ludmer.margo@epa.gov>; Grosvenor, Sarah <grosvenor.sarah@epa.gov>
Subject: RE: Canadian Radium litigation contact list

Hi all,

I wasn't sure who I should cc on this email, but I just wanted to advise Weston's counsel that we are including this language in our letter to the Court due today. Just let me know if there are any issues. Also, let me know if there are any updates on Weston filing a motion to quash the subpoenas. Thanks!

"The Government has spoken to counsel for Weston Solutions, and understands that Weston intends to move to quash the subpoenas for the three employees that have been subpoenaed. (One Weston employee who resides in New Jersey has not been subpoenaed yet). Should the Court find that EPA lacks standing to move to quash the non-party subpoenas, EPA respectfully requests that this letter be considered a statement in support of Weston's forthcoming motion."

From: Benton, Tim <Tim.Benton@WestonSolutions.com>
Sent: Wednesday, December 4, 2019 11:19 AM
To: Bretz, Emily (USANYS) <EBretz@usa.doj.gov>
Cc: Freeman, Hope <freeman.hope@epa.gov>; Pane, Mark <Pane.Mark@epa.gov>; Gaughan, Daniel <Gaughan.Daniel@epa.gov>; Tabayoyong, Michelle <Tabayoyong.Michelle@epa.gov>; Ludmer, Margo <ludmer.margo@epa.gov>; Grosvenor, Sarah <grosvenor.sarah@epa.gov>
Subject: RE: Canadian Radium litigation contact list

Thanks for sharing Emily!

From: Bretz, Emily (USANYS) [mailto:Emily.Bretz@usdoj.gov]
Sent: Wednesday, December 4, 2019 11:11 AM
To: Benton, Tim <Tim.Benton@WestonSolutions.com>; Grosvenor, Sarah <grosvenor.sarah@epa.gov>
Cc: Freeman, Hope <freeman.hope@epa.gov>; Pane, Mark <Pane.Mark@epa.gov>; Gaughan, Daniel <Gaughan.Daniel@epa.gov>; Tabayoyong, Michelle <Tabayoyong.Michelle@epa.gov>; Ludmer, Margo <ludmer.margo@epa.gov>
Subject: RE: Canadian Radium litigation contact list

**** External Email ****

Please find attached the complaint, Cannistra's motion for a preliminary injunction, and our response.

From: Benton, Tim <Tim.Benton@WestonSolutions.com>
Sent: Wednesday, December 4, 2019 10:57 AM
To: Grosvenor, Sarah <grosvenor.sarah@epa.gov>; Bretz, Emily (USANYS) <EBretz@usa.doj.gov>
Cc: Freeman, Hope <freeman.hope@epa.gov>; Pane, Mark <Pane.Mark@epa.gov>; Gaughan, Daniel <Gaughan.Daniel@epa.gov>; Tabayoyong, Michelle <Tabayoyong.Michelle@epa.gov>; Ludmer, Margo <ludmer.margo@epa.gov>
Subject: RE: Canadian Radium litigation contact list

Thanks Sarah!

Emily,

Weston's Assistant General Counsel, Megan Schwartz, proposed to conduct the conference call this afternoon at 2:00 pm. Would that time work with your schedule? If so, I will send out the conference call calendar appointment. Also, do you think that anyone else within this group should be involved with the call?

Thanks,

Timothy Benton, CHMM
START V Program Manager
Weston Solutions, Inc.
1090 King George Post Road
Suite 201
Edison, New Jersey 08837
Office Phone: (732) 585-4425
Cell Phone: (908) 565-2973

From: Grosvenor, Sarah [mailto:grosvenor.sarah@epa.gov]
Sent: Wednesday, December 4, 2019 10:47 AM
To: Benton, Tim <Tim.Benton@WestonSolutions.com>; Pane, Mark <Pane.Mark@epa.gov>; Gaughan, Daniel <Gaughan.Daniel@epa.gov>; Tabayoyong, Michelle <Tabayoyong.Michelle@epa.gov>; Ludmer, Margo <ludmer.margo@epa.gov>; emily.bretz@usdoj.gov
Cc: Freeman, Hope <freeman.hope@epa.gov>
Subject: Canadian Radium litigation contact list

**** External Email ****

All,

Here's the roster of folks from our call this morning, plus Michelle Tabayoyong who will be involved from the Program Office.

Tim Benton

Program Manager
Weston Solutions
Office Phone: (732) 585-4425
Cell Phone: (908) 565-2973
tim.benton@westonsolutions.com

Dan Gaughan

OSC & START V COR
EPA Region 2
732-906-6984
Gaughan.Daniel@epa.gov

Mark Pane

START V Program Officer & START V COR
EPA Region 2
732-906-6872
Pane.Mark@epa.gov

Michelle Tabayoyong

START V Program Officer & START V COR
EPA Region 2
732-906-6934
Tabayoyong.Michelle@epa.gov

Margo Ludmer

Assistant Regional Counsel
EPA Region 2
212-637-3187
Ludmer.Margo@epa.gov

Emily Bretz

Assistant United States Attorney
United States Attorney's Office, SDNY
Tel: (212) 637-2777
Email: emily.bretz@usdoj.gov

Sarah Grosvenor

Contracting Officer
EPA Region 2
Direct: 212.637.4128
Grosvenor.Sarah@EPA.gov

Additionally, please include Hope Freeman on all correspondence for this issue as she comes up to speed in supporting this contract.

Hope Freeman

Contracting Officer/ Regional Acquisition Manager
Direct: 212-637-4122
Freeman.Hope@EPA.gov

Thank you,

Sarah Grosvenor
Contracting Officer
EPA Region 2
Direct: 212.637.4128
Grosvenor.Sarah@EPA.gov

WARNING: External Email: This email originated outside of Weston Solutions. DO NOT CLICK on any links or attachments unless you recognize the sender and are expecting the email.

CONFIDENTIALITY: This email and attachments may contain information which is confidential and proprietary. Disclosure or use of any such confidential or proprietary information without the written permission of Weston Solutions, Inc. is strictly prohibited. If you received this email in error, please notify the sender by return e-mail and delete this email from your system. Thank you.

WARNING: External Email: This email originated outside of Weston Solutions. DO NOT CLICK on any links or attachments unless you recognize the sender and are expecting the email.

CONFIDENTIALITY: This email and attachments may contain information which is confidential and proprietary. Disclosure or use of any such confidential or proprietary information without the written permission of Weston Solutions, Inc. is strictly prohibited. If you received this email in error, please notify the sender by return e-mail and delete this email from your system. Thank you.

WARNING: External Email: This email originated outside of Weston Solutions. DO NOT CLICK on any links or attachments unless you recognize the sender and are expecting the email.

CONFIDENTIALITY: This email and attachments may contain information which is confidential and proprietary. Disclosure or use of any such confidential or proprietary information without the written permission of Weston Solutions, Inc. is strictly prohibited. If you received this email in error, please notify the sender by return e-mail and delete this email from your system. Thank you.